

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In Re:

In Bankruptcy No:

NICHOLAUS SWEATT

Debtor

Case No: 24-10787 (CJF) (Chapter 13)

**OBJECTION TO THE RULE 2004 EXAMINATION AS IT RELATES TO PRODUCTION OF
DOCUMENTS AND EXAMINATION DATE OF OCTOBER 23, 2024 AT 9:00 A.M. IN SAID
MORNING**

Nicholaus Sweatt, debtor, by his attorneys PITTMAN & PITTMAN LAW OFFICES, LLC by Galen W. Pittman on behalf of Wade Pittman hereby objects to the Rule 2004 Examination Production of Documents and Examination date as follows:

1. Wade Pittman is not available on October 23, 2024 at 9:00 a.m. due to 341 and other Court commitments on said date and there is nobody else in the Pittman office to undertake and stand in for that examination.
2. The Krekeler Law Office did not as a courtesy reach out to the Attorney Wade Pittman for availability on date and production of documents. It is a long known practice that prior to doing and undertaking a 2004 Production of Documents and setting an examination date that you ask opposing counsel for availability or other dates of availability for said examination and production of documents.
3. As to the production of documents, the request is overly broad reaching well beyond the scope of the amended schedules and relate to valuation which is currently held under separate hearing and furthermore refers to documents of the nonfiling spouse which do not relate to the Chapter 13 case. The production of documents is voluminous, overreaching and broad in its scope without defining the purpose of the examination. For example, it relates to insurance, offers to purchase, listing contracts, auction contracts, and an overreaching as to loan documents,

statements and applications at the Summit Credit Union. In addition, it requests copies of the debtors credit cards dating back to January 1, 2023.

4. Finally, this case has been pending for over four (4) months now and there has not been any activity relating to a 2004 Examination previously undertaken. Additionally, half of the production of documents relate to the valuation issue which is currently being tried next week.
5. As a result of this Objection, the undersigned request is for a Hearing to be set on the 2004 Motion and examination date including production of documents.

Dated this 26 day of September, 2024 at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC

By:


s/Galen W. Pittman

Galen W. Pittman on behalf of Wade Pittman

Attorney for Debtor

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